

RICHARD E. DONALDSON, ESQ., CHTD.
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * * * *

PATRICIA J. SHANNON

Plaintiff,

vs.

MICHAEL J. ASTRUE,
COMMISSIONER OF
SOCIAL SECURITY,

Defendant.

CASE NO.: 2:11-CV-0394 JCM-CWH

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE A MOTION FOR REVERSAL AND/OR REMAND
(First Request)**

Plaintiff, PATRICIA J. SHANNON by and through her attorney of record,
RICHARD E. DONALDSON, ESQ., respectfully requests an extension of time of an
additional thirty (30) days, to and including, Friday, September 30, 2011, in which to file a
Motion for Reversal and/or Remand.

This request is necessary so that the Plaintiff can complete additional research,
and finish the writing, which has taken much longer than anticipated. At the present
time, Plaintiff's deadline to file the Motion for Reversal and/or Remand is Friday, August
5, 2011, and counsel has been unable to finish the brief by today.

This request is being filed as a Motion as the undersigned counsel contacted Carlos

1 A. Gonzalez, Assistant United States Attorney and counsel of record for the Defendant,
2 and Mr. Gonzalez does not oppose this Motion.

3 This is the first request for an extension of time to file the Motion.

4 DATED this 30th day of August, 2011.

5 Respectfully submitted,

6 RICHARD E. DONALDSON, ESQ., CHTD.

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8 By: *Richard E. Donaldson, Esq*
9 RICHARD E. DONALDSON, ESQ.
10 Nevada Bar No. 1095
11 2300 West Sahara Ave., Suite 800
12 Las Vegas, NV 89102
13 (702) 382-6370
14 Attorney for Plaintiff

15 IT IS SO ORDERED:

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17 _____
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: August 31, 2011
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